

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LARHONDA BIGGLES,	§	
	§	
Plaintiff,	§	Civil Action No. 4:22-cv-03326
	§	
v.	§	Judge Charles Eskridge
	§	
HARRIS COUNTY, TEXAS, et al.,	§	
	§	
Defendants.	§	

MOTION FOR SUBSTITUTION OF COUNSEL

Pursuant to Local Rule 83.2, Plaintiff LaRhonda Biggles, through her undersigned counsel, respectfully moves the Court to substitute her counsel in the above-captioned matter. In support of this motion, Plaintiff states:

1. Plaintiff commenced this action by filing a complaint on September 28, 2022.
ECF 1.
2. At the time of filing and through the present day, Plaintiff has been represented by the following counsel in this action: John J. Coyle, Esq., law firm of McEldrew Purtell; and Daniel Cienfuegos, Jr. (collectively, “Existing Counsel”).
3. Plaintiff desires to change the counsel representing her in this action from Existing Counsel to the law firm of Loevy & Loevy (“New Counsel”).
4. The following Loevy & Loevy attorneys desire to represent Plaintiff in this action: Thomas Hanson (Texas State Bar No. 24068703, Southern District of Texas Bar No. 1197255); Jonathan Loevy (Illinois State Bar No. 6218254, application to appear *pro hac vice* pending), Stephen H. Weil (attorney-in-charge, Illinois State Bar No. 6291026, application to appear *pro hac vice* pending), and Quinn Rallins (Illinois State Bar No. 6339556, application to

appear *pro hac vice* pending). Appearances and applications to appear *pro hac vice* by these attorneys are being filed concurrently with this motion.

5. Plaintiff has informed Existing Counsel in writing of her desire to terminate their representation in the action and to change the counsel representing her in this action from Existing Counsel to New Counsel. Plaintiff has further instructed Existing Counsel to transfer their case file in this action to New Counsel.

6. Existing Counsel desire to comply with Plaintiff's instructions.

WHEREFORE, Plaintiff, by and through her undersigned counsel, respectfully moves the Court to permit the substitution of counsel for Plaintiff from attorney John J. Coyle, Esq. and the law firm of McEldrew Purtell, and attorney Daniel Cienfuegos, Jr., to the law firm of Loevy & Loevy and attorneys Thomas Hanson, Jonathan Loevy, Stephen Weil, and Quinn Rallins.

Dated: December 7, 2023

Respectfully submitted,

<p>By: <u>/s/John Coyle</u> John Coyle</p> <p>John J. Coyle, Esq. McEldrew Purtell 123 South Broad Street, Suite 2250, Philadelphia, PA 19109 Phone: 215-545-8800 ext. 103 Email: jcoyle@mceldrewpurtell.com Pennsylvania; 312084</p>	<p>By: <u>/s/ Thomas Hanson</u> Thomas Hanson</p> <p>By: <u>/s/ Stephen H. Weil</u> Stephen H. Weil <i>attorney-in-charge</i></p> <p>Thomas Hanson Jonathan Loevy <i>pro hac vice pending</i> Stephen H. Weil <i>pro hac vice pending</i> (attorney-in-charge) Quinn Rallins <i>pro hac vice pending</i> Loevy & Loevy 311 N. Aberdeen Street Chicago, IL 60607 312-243-5900 weil@loevy.com</p>
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<p>By: <u>/s/Daniel Cienfuegos, Jr.</u> Daniel Cienfuegos, Jr. Litigation Attorney The Law Offices of Omar Khawaja PLLC 5177 Richmond Avenue, Suite 1065 Houston, Texas 77056 P: 281-888-2339 Daniel@AttorneyOmar.com</p>	

CERTIFICATE OF SERVICE

I, Thomas Hanson, an attorney, hereby certify that on December 7, 2023, I filed the foregoing document via CM/ECF, which was electronically delivered to all counsel of record.

/s/Thomas Hanson
Attorney for Plaintiff